

THOMAS E. MONTGOMERY, County Counsel
County of San Diego
By ROBERT A. ORTIZ, Senior Deputy (SBN 246849)
FERNANDO KISH, Senior Deputy (SBN 236961)
1600 Pacific Highway, Room 355
San Diego, California 92101-2469
Telephone: (619) 531- 5279
E-mail: robert.ortiz@sdcounty.ca.gov

Attorneys for Defendants County of San Diego, William D. Gore, Alfred Joshua, M.D.,
Larry DeGuzman, David Guzman and Mary Montelibano

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

DAVE THOMAS, as Guardian ad Litem
on behalf of JONATHAN THOMAS,

Plaintiff,

v.

COUNTY OF SAN DIEGO, WILLIAM
D. GORE, individually; ALFRED
JOSHUA, individually; and DOES
1 through 100, inclusive,

Defendants.

Case No.15cv2232-L-AGS

**JOINT MOTION FOR
PROTECTIVE ORDER**

Pursuant to Civil Local Rule 7.2, the parties, through their respective attorneys of record, jointly move the court for a protective order concerning certain documents of the County of San Diego to be produced to the other parties in this case. The parties hereby make this application on the following grounds:

1. The parties in this case have served document requests on the County of San Diego that request jail records pertaining to non-party inmates and other confidential sensitive information.

2. Defendant County of San Diego has agreed to produce some of these records pursuant to a protective order.

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1 3. The parties have agreed on the language of a proposed protective order which is
2 attached to this joint motion and specifies the conditions under which private, sensitive,
3 and/or legally confidential documents and information in possession of the parties must
4 be exchanged, used, and protected in this litigation.

5 4. Because the materials sought from the County of San Diego, through discovery,
6 contain private, sensitive and/or legally confidential information, the attached protective
7 order is justified by Rule 26(c) of the Federal Rules of Civil Procedure and relevant case
8 law and is necessary in order for the parties to exchange pertinent discovery.

9 The parties respectfully request that the Court execute the proposed protective
10 order.

11 DATED: August 20, 2018 THOMAS E. MONTGOMERY, County Counsel
12 By: s/ROBERT A. ORTIZ, Senior Deputy
13 Attorneys for Defendants County of San Diego, William
14 D. Gore, Alfred Joshua, M.D., Larry DeGuzman, David
15 Guzman and Mary Montelibano

16 DATED: August 20, 2018 LOTZ, DOGGETT & RAWERS, LLP
17 By: s/LAUREN HARDISTY, ESQ.
18 Attorneys for Defendant Jorge Naranjo, M.D.

19 DATED: August 20, 2018 MORRIS LAW FIRM, APC
20 By: s/DANIELLE R. PENA, ESQ.
21 Attorneys for Plaintiff Jonathan Thomas, by and through
22 his Guardian Ad Litem Dave Thomas

23 SIGNATURE CERTIFICATION

24 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies
25 and Procedures Manual of the United States District Court for the Southern District of
26 California, I certify that the content of this document is acceptable to counsel for all
27 parties and that I have obtained authorization for all of the foregoing signatories to affix
28 their electronic signature to this document.

DATED: August 20, 2018 THOMAS E. MONTGOMERY, County Counsel
By: s/ROBERT A. ORTIZ, Senior Deputy
Attorneys for Defendants County of San Diego, William
D. Gore, Alfred Joshua, M.D., Larry DeGuzman, David
Guzman and Mary Montelibano